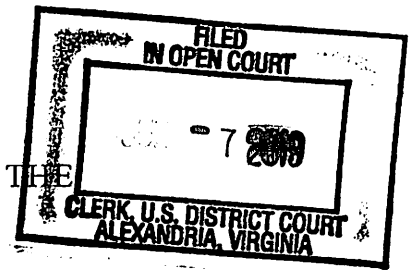


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

IURII AKHALAIA,

Defendant.

Criminal No. 1:18-CR-408

The Hon. T.S. Ellis, III

JOINT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER

The United States of America, by and through G. Zachary Terwilliger, United States Attorney, and Laura Fong, Assistant United States Attorney, and the defendant, by his undersigned counsel, respectfully move this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). In support thereof, the parties state as follows:

1. During the course of the investigation, the United States has gathered or generated voluminous documents, including electronic records, which contain the confidential information and personal identifiers for victims, defendants, and non-parties in this case, that cannot be readily redacted or separated. The United States intends to produce these documents and electronic records, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and this Court's Discovery Order.

2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of all documents and electronic records obtained through discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as

necessary for the defendant's investigation of the allegations and the preparation of his defenses. Nothing in this Protective Order prohibits dissemination to defense experts, consultants, and others who may be involved in preparing the defendant's case. In addition, the proposed Protective Order prohibits the defendant from reviewing any Protected Documents outside of counsel's presence.

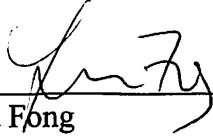
3. The defendant and his counsel have reviewed this Motion and the Protective Order, and have agreed to its terms.

WHEREFORE, the undersigned respectfully request that the Court enter the proposed Protective Order.

Respectfully submitted,

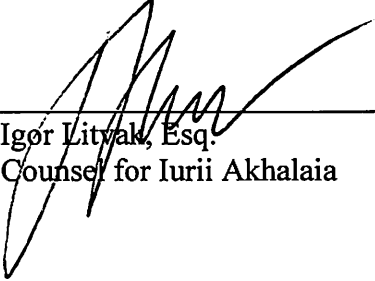
G. Zachary Terwilliger
United States Attorney

By:



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SEEN AND AGREED:



Igor Litvak, Esq.
Counsel for Iurii Akhalaia